

JAMES E. JOHNSON
Corporation Counsel

THE CITY OF NEW YORK LAW DEPARTMENT 100 CHURCH STREET NEW YORK, NY 10007

LANA KOROLEVA

Assistant Corporation Counsel
Phone: (212) 356-4377
Fax: (212) 356-2089
Email: lkorolev@law.nyc.gov

January 13, 2020

VIA ECF

Honorable Jesse M. Furman United States District Court Southern District of New York 40 Foley Square New York, New York 10007

Re: N.J. and G.J. v. N.Y.C. Dep't of Educ., et al.

18-cv-06173 (JMF)

Dear Judge Furman:

I am the Assistant Corporation Counsel in the Office of the Corporation Counsel, recently assigned to represent the Defendants, New York City Department of Education, New York City Board of Education, and Chancellor Richard Carranza, in his official capacity, in the above-referenced action. I am writing to respectfully request an enlargement of the summary judgment schedule due to the recent departure of Christopher Ferreira, the attorney previously assigned to this case, who has left the Corporation Counsel's office.

Pursuant to the Court's Order, dated November 6, 2019, Defendants' motion is due by January 15, 2020; Plaintiffs' opposition (including, as appropriate, any Rule 56(d) affidavit) is due by February 15, 2020; and Defendants' reply is due by February 29, 2020. In light of the departure of Mr. Ferreira, Defendants require additional time to prepare appropriate papers. I am only now beginning to review the case to familiarize myself with the issues and procedural history.

Accordingly, Defendants respectfully request a 6-week extension of the briefing schedule as follows: Defendants' motion would be due by February 26, 2020; Plaintiffs'

_

¹ By separate letter, the parties will submit a status update addressing settlement and other issues in this case as directed by the Court in the Order dated November 6, 2019.

opposition (including, as appropriate, any Rule 56(d) affidavit) would be due by March 25, 2020; and Defendants' reply would be due by April 8, 2020.

This is Defendants' first request for an extension of the briefing schedule. Plaintiffs' counsel, Elisa Hyman, consents to the request.

Thank you for Your Honor's consideration.

Respectfully submitted,

s/ Lana Koroleva

Lana Koroleva Assistant Corporation Counsel

cc: Elisa Hyman

Attorney for Plaintiffs

(Via ECF)

Application GRANTED. The revised briefing schedule is adopted as set forth herein (Defendants' motion due **February 26, 2020**; Plaintiffs' opposition due **March 25, 2020**; Defendants' reply due **April 8, 2020**). The Clerk of Court is directed to terminate ECF No. 55. SO ORDERED.

January 14, 2020